

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOHN T. CORPAC, an individual;)	
on behalf of himself)	
and all others similarly situated,)	No. 10-CV-4165 (ADS)(ETB)
)	
Plaintiff,)	
)	
v.)	
)	
RUBIN & ROTHMAN, LLC, a New York)	
Limited Liability Company; and)	
JOHN AND JANE DOES)	
NUMBERS 1 THROUGH 25,)	
)	
Defendants.)	

Reply Declaration of Carolyn Coffey in
Support of the Objections of Casila M. Aybar

Under 28 U.S.C. § 1746, I, Carolyn E. Coffey, do hereby declare under penalty of perjury, that the following is true and correct:

1. I am the Supervising Attorney of the Consumer Rights Project at MFY Legal Services, Inc., ("MFY").
2. I am writing this reply declaration in order to rebut some allegations made by William Horn in his letter, dated April 23, 2015.
3. Like Matthew A. Schedler and the organization he works for, CAMBA Legal Services, MFY represents poor and working poor people who are being pursued for alleged consumer debts, frequently by debt-collection law firms like Rubin & Rothman, LLC.

4. For all of the reasons highlighted by Mr. Bromberg, Mr. Schedler and the Legal Aid Society, many other legal services organizations in New York City have concerns about this settlement.

5. Therefore, MFY considered objecting on behalf of one of our clients.


6. In the end, however, we decided that as a not-for-profit, our resources were limited and that we could not devote sufficient time to objecting formally to the settlement.

7. Instead, we decided to rely on Mr. Bromberg and Mr. Schedler to oppose the settlement.

8. In reaching this conclusion, we knew that Mr. Bromberg and Mr. Schedler were representing a new objector and were bearing the burden of the consumers whose rights would otherwise be extinguished by the settlement.

9. Like CAMBA, we frequently rely on private attorneys to devote their resources to litigating cases that, as a not-for-profit organization, we simply do not have the resources to pursue.

Dated: April 27, 2015
New York, New York



Carolyn E. Coffey